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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEVADA**

PAMELA LEWIS,  
Plaintiff,  
vs.

Case No. 2:15-cv-01368

CASA DI AMORE LLC, JEFF SCHWARTZ,  
individually and dba CASA DIAMORE,  
LLC, MICHAEL CAMPAGNO, individually  
and dba CASA DI AMORE, DOES 1-100,  
ROE ENTITIES 1-100,

Defendants.

**MOTION FOR ATTORNEY'S FEES,  
COSTS AND INTEREST**

COMES NOW Plaintiff, Pamela Lewis, by and through counsel of record Patricia A. Marr, Esq. of the law office of Patricia A. Marr, Ltd. and hereby submits her Motion as follows.

Dated this 24<sup>th</sup> day of September, 2018.

PATRICIA A. MARR, LTD.

/s/Patricia A. Marr, Esq.

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1 exceptional contentious nature of this action.

2 In that regard, the Court awarded attorneys' fees and costs to Lewis pursuant to  
3 FLSA and NRS § 608.140. The Court found that while Lewis is not entitled to double recovery, she  
4 is entitled to the maximum award under either federal or state law.

5 In accordance with the same, the Declaration of Lewis' counsel in support of her Motion  
6 for fees, costs and interest is filed herewith as **Exhibit 1**, Declaration and billing invoice for  
7 attorney's fees. The total hours spent in attorney time are **109.4** at the hourly rate of \$600.00  
8 totals attorney's fees in the amount of **\$65,640.00**, **Exhibit 2**.

### 10 **COSTS**

11 Plaintiff was the prevailing party at the five (5) day bench trial in this matter, which  
12 concluded on January 12, 2018.

13 Lewis submits that her costs incurred were reasonable and necessary as a result of  
14 Defendant's conduct and the prosecution of this action. The costs incurred are attached herein as  
15 **Exhibit 3** and total **\$1,077.00** related to fees for the filing and service of the Complaint, hard  
16 copy costs and Pacer costs.

### 18 **PRE-JUDGMENT INTEREST**

19 Plaintiff further request interest as the prevailing parties and on August 23, 2018, the  
20 Court entered its *Order re: Findings of Fact and Conclusions of Law After Court Trial*. The  
21 Court awarded prejudgment interest to Lewis pursuant to NRS § 99.040. Interest is due from the  
22 time Lewis submitted her written demand for back wages, July 4, 2015, to the date of entry of  
23 judgment. Accordingly, the interest is as follows:

24 Prejudgment Interest (NRS 17.130(2)) from July 4, 2015 (date of demand) to August 23,  
25 2018 (1,146 days), at 7.00% per year on the **\$18,211.47**<sup>2</sup> in past compensatory damages is

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27  
28  

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<sup>2</sup> \$16,612.11 in unpaid wages and \$1,599.36 in unpaid overtime.

\$4,036.77 for a total award of \$22,248.24.

Dated this 24<sup>th</sup> day of September, 2018.

PATRICIA A. MARR, LTD.

/s/Patricia A. Marr, Esq.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 24<sup>th</sup> day of September, 2018, I hereby served a copy of the foregoing, Plaintiff's *Motion for Attorney's Fees, Costs and Interest* to all parties to this action via E-Service.

/s/Patricia A. Marr, Esq.

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An employee of Patricia A. Marr, Ltd.